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Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DOE 1, DOE 2, and KASADORE
RAMKISSOON, on Behalf of
Themselves and all other Persons
Similarly Situated,

Plaintiffs,

v.

AOL LLC,

Defendant.

CASE NO. C 06-5866 SBA

Honorable Sandra Brown Armstrong

**JOINT STIPULATION and ORDER FOR
A LIMITED EXTENSION OF
DISCOVERY DEADLINE**

[C 06-5866 SBA]

**JOINT STIPULATION and
[PROPOSED] ORDER FOR
A LIMITED EXTENSION
OF DISCOVERY DEADLINE**

RECITALS

WHEREAS the Court has ordered that all discovery, except for expert discovery, shall be completed and all depositions taken before November 5, 2010.

WHEREAS the parties have been working diligently to meet the November 5, 2010 discovery deadline.

WHEREAS because of scheduling conflicts beyond the parties' control, the deposition of one non-party witness (John Kannapell) could not be scheduled until November 10, 2010.

WHEREAS in the course of discovery, numerous discovery disputes have arisen that the parties were able to resolve through the meet-and-confer process.

WHEREAS there are several outstanding discovery disputes that the parties have not been able to resolve through the meet and confer process.

WHEREAS Plaintiffs have indicated their intent to seek the intervention of Magistrate Judge Spero with respect to those remaining discovery disputes, in accordance with Magistrate Judge Spero's Standing Order on Discovery Disputes.

WHEREAS should Magistrate Judge Spero order AOL to produce additional documents it may take additional time for AOL to comply with such an order.

WHEREAS the parties have not previously requested any extension of time with respect to the discovery deadline.

WHEREAS the requested time modification would not have any other effect on the schedule for the case.

IT IS THEREFORE STIPULATED by and between the parties, acting through their counsel of record, that, subject to the Court's approval, the discovery deadline be extended by thirty-one (31) days, until December 6, 2010, for the limited purpose of allowing Plaintiffs to

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1 take the deposition of John Kannapell and allowing AOL to comply with any order entered by
2 Magistrate Judge Spero with respect to any outstanding discovery disputes.

3 SO STIPULATED

4
5 Dated: November 8, 2010

6
7 /s/ Manuel J. Dominguez

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E-Filing Attestation

I, Nathaniel L. Orenstein, am the ECF User whose ID and password are being used to file this document. In compliance with General Order 45 X.B, I hereby attest that the signatory identified below concurred in its filing.

/s/Nathaniel L. Orenstein
Nathaniel L. Orenstein
(*Pro Hac Vice*)

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Attorneys for AOL LLC

ORDER

IT IS SO ORDERED.

Dated: 11/5/10


THE HONORABLE SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT JUDGE

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